



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW
ATLANTA, GEORGIA 30303-8960

SENT VIA ELECTRONIC MAIL

Eddie E. Hook
Facility Manager
Safety-Kleen Systems, Inc.
Lexington Distribution Center
128 Frontage Road
Lexington, SC 29703
eddie.hook@safety-kleen.com

Dear Eddie E. Hook:

On January 24, 2023, the U.S. Environmental Protection Agency Region 4 Air Enforcement Branch conducted a partial compliance inspection of Safety-Kleen Systems, Inc., located in Lexington, South Carolina. We have enclosed the final report generated for this inspection (Enclosure).

If you have any questions, please contact me at (404) 562-9206, or by email at hughes-fairley.rosalyn@epa.gov.

Sincerely,

ROSALYN
HUGHES FAIRLEY
Rosalyn Hughes Fairley
Environmental Engineer
South Air Enforcement Section

Digitally signed by ROSALYN
HUGHES FAIRLEY
Date: 2023.03.20 12:30:52
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Enclosures

**ENCLOSURE
INSPECTION REPORT**

**United States Environmental Protection Agency (EPA) Region 4
Air Enforcement Branch
Inspection Report**

I. GENERAL INFORMATION

Facility Name: Safety-Kleen Systems, Inc.

Location (Address): 128 Frontage Road, Lexington, SC 29073

Inspection Date: January 24, 2023

Type of Inspection (Full or Partial Compliance Evaluation):
Partial Compliance Evaluation

PROGRAMMATIC ID: SC000156000039

PERMIT NUMBER: SOP-1560-0039

EPA Region 4 Investigator(s)/Inspector(s):

1. Rosalyn Hughes Fairley, Environmental Engineer
2. Sharron Porter, Environmental Engineer
3. Steve Rieck, Environmental Scientist

State/Local Investigator(s)/Inspector(s):

1. Reggie Watts, Environmental Engineer

Person(s) Contacted at Facility (Name and Title):

1. Eddie E. Hook, Facility Manager
2. Steve Hopkins, Operations Manager

Report Prepared by: Rosalyn Hughes Fairley

FACILITY INFORMATION

A. Facility and Permit Information

Facility and Permit Information	Comments
1. Type of facility (e.g., chemical plant, refinery, cement manufacturer, etc.).	Off-site Waste Recycling Operations
2. Air permit number(s) and type of permit (e.g., Title V, PSD, Synthetic Minor, etc.).	SCDHEC SOP-1560-0039
3. Air permit issuance date.	January 1, 2020
4. Air permit expiration date.	No Expiration Date
5. Facility classification (Major, Synthetic Minor/Conditional Major, Minor).	Minor
6. Major source pollutants (if applicable).	N/A
7. Applicable regulations (e.g., State Implementation Plan, MACT Subpart FFFF, NSPS Subpart EEEE, etc.).	State Implementation Plan
8. Types of air emission points (e.g., tanks, process vents, boilers, etc.).	Tanks and process vents
9. Types of air pollution control equipment (e.g., baghouse, scrubber, afterburner, etc.).	Flare

B. Process Description

Safety-Kleen Systems, Inc. operate a storage, recycling, and reclamation facility for a variety of used solvents. Waste solvents and other spent chemicals are received into the facility's storage tanks. The solvents and chemicals are processed for reuse and stored in the facility's storage tanks prior to shipment to customers.

II. INSPECTION ACTIVITIES

Activity	Yes No NA	Comments
Opening Meeting		
1. Date and time entered the facility.	Y	EPA Region 4 (R4) inspectors arrived at the facility on January 24, 2023, at approximately 9:00 am.
2. Credentials presented to facility personnel (include name and title).	Y	All inspectors presented their credentials to Eddie L. Hook, Facility Manager
3. Conducted an opening meeting to explain the purpose and objectives of the inspection.	Y	Inspectors held an opening meeting with Eddie Hook to discuss the purpose and objectives of the inspection. Steve Hopkins also joined the discussion.
4. Discussed safety issues.	Y	Inspectors discussed facility-specific safety and emergency procedures and appropriate protective equipment.
5. Discussed which records to be reviewed.	N	The inspection team requested the following records: Number of tanks and the size Flare performance test Leak Detection and Repair Emissions Calculations
6. Discussed the facility walk-through and the areas to be observed in the facility.	Y	Inspectors were primarily interested in inspection of the tanks and the flare

Activity	Yes No NA	Comments
7. Discussed facility policy regarding photographs or video (if applicable).	Y	Region 4 inspectors indicated a digital camera and an Optical Gas Imaging camera would be used during the inspection. The team discussed facility policy regarding photography and videography. Inspectors indicated that copies of any videos or photographs taken at the facility would be sent to the company. A log of photographs and videos taken at the facility is included in this report. See Appendix A.
8. Discussed the use of the infrared camera, TVA, PID, and any other equipment.	N/A	TVA/PID were not used during the inspection.
9. Discussed CBI.	Y	EPA inspectors indicated that any material claimed to be Confidential Business Information (CBI) would be treated in accordance with regulations. The draft report was sent to Safety-Kleen and Mr. Hook did identify any CBI information in the draft inspection report.

Activity	Yes No NA	Comments
Records Reviewed at the Facility		
10. The types of records reviewed, and the time period reviewed.	N	The inspection team reviewed the past 4 months of leak detection records during the inspection. The flare performance test report was not available during the inspection. The 2021 flare maintenance records for were reviewed during the inspection.
Facility Walk-Through Observations		
11. The process equipment observed and the associated operational rate observed (e.g., Furnace 1 production rate was 5 lbs/hr on 1/1/15, at 2:00 pm – permit requires max rate at 6 lbs/hr). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	

Activity	Yes No NA	Comments
12. The type of process parametric monitoring observed and the associated value observed (e.g., Furnace 1 flux injection rate was 200 lbs/batch at 1/1/15, at 2:00 pm – permit requires max rate at 225 lbs/batch). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
13. If process equipment or parametric monitoring equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	

Activity	Yes No NA	Comments
14. The type of air pollution control equipment, the process equipment it is controlling, and the associated parametric monitoring value observed (e.g., baghouse pressure drop, temperature, scrubber flow rate, etc.). (For example - RTO 1 controlling furnace 1, 1,500 degrees F on 1/1/15, at 2:00 pm – permit requires 1,400 degree F or higher). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	Y	The distillation unit is equipped with a flare. The flame indicator on the distillation control panel was on, which indicated the pilot light was on and the flare was in operation. The unit is equipped with a flare alarm system to notify the facility when the flare is not operational. It, also, has a lock out system for flare safety. Since the permit did not contain parametric monitoring, no parameters associated with the flare were recorded.

Activity	Yes No NA	Comments
15. Continuous emissions monitoring devices and values observed. (e.g., CEMS, COMs, etc.). Provide the date and time the information was recorded by the inspector. Identify the permit limit (if applicable). An attachment may be used for a large amount of information.	N/A	
16. If air pollution control equipment was not operating, state the reason by facility personnel why the equipment was not operating.	N/A	
17. Capture and collection system (enclosures and hoods) observations, if applicable (e.g., the magnitude and duration of emission escaping capture from the hood).	N/A	

Activity	Yes No NA	Comments
18. Ductwork transferring the emissions to the air pollution control device observations, if applicable (e.g., the magnitude and duration of emission escaping from the ductwork, holes or deterioration in ductwork, no deterioration observed, etc.).	Y	The infrared camera was used to observe the flare. No emissions were observed from the ductwork.
19. Any existing unpermitted emission points, new unpermitted emission points, or non-permitted construction activities observed. (if yes, describe in the comments field).	N	
20. Were any visible emissions observed? (if yes, identify the location and equipment).	N	
21. Was a Method 9 reading performed? (if yes, identify the location and equipment).	N	
22. Was the cause of the visible emissions investigated and the information documented?	N/A	

Activity	Yes No NA	Comments
23. Was a Method 22 performed for visible emissions? (if yes, identify the location and equipment).	N	
24. Identify the cause of the visible emissions as explained by facility personnel, if applicable.	N/A	
25. Was the infrared camera used? If so, attach the video log (which includes the equipment ID, and the date and time the video was recorded) and videos to this report.	Y	The infrared camera videos and the video log are attached. The photos taken with the digital camera are attached and included on the video log.
26. Was the TVA used? If so, identify the equipment monitored and the results. Provide the date and time the information was recorded by the inspector. Include actual instrument readings for each piece of equipment monitored above the leak definition and/or where the infrared camera identified a release. An attachment may be used for a large amount of information.	N	EPA R4 inspectors did not use a TVA at the facility.

Activity	Yes No NA	Comments
27. Was the PID used? If so, identify how the PID was used and the results. Provide the date and time the information was recorded by the inspector. An attachment may be used for a large amount of information.	N	EPA R4 inspectors did not use a PID at the facility.
Closing Meeting		
28. Conducted a closing meeting.	Y	EPA Region 4 inspectors conducted a closing meeting on January 24, 2023.
29. Summarize any additional information needed, if applicable?	Y	The emissions calculations were not available at the facility during the inspection, but Mr. Hook agreed to send the information. The information was received on February 3, 2023.
30. Accept a declaration of CBI, if applicable?	N/A	
31. Discussed observations.	Y	Inspectors thanked facility personnel for their time and summarized inspection activities. The inspectors indicated that the flare performance test was not reviewed, and the report may be requested later.
32. Discussed next steps, if applicable?	Y	The facility agreed to send the latest emission calculations to EPA and as noted above were received. A final inspection report from EPA Region 4 will be sent to the company within a 70-day timeframe.

Activity	Yes No NA	Comments
33. Date and time inspection concluded.		The inspection concluded on January 24, 2023, at approximately 11:30 a.m.
Miscellaneous		
34. Include any additional observations, if applicable.	N/A	

EPA Investigator/Inspector Signature: ROSALYN HUGHES FAIRLEY Digitally signed by ROSALYN HUGHES FAIRLEY
Date: 2023.03.20 12:33:35 -04'00'

EPA Supervisor Signature & Title: TODD GROENDYKE Digitally signed by TODD GROENDYKE
Date: 2023.03.20 10:28:38 -04'00'

Date Report Finalized: March 20, 2023

APPENDICES AND ATTACHMENTS

1. Appendix A. Inspection Photograph log

Appendix A: Inspection Photograph Log

During the January 24, 2023, inspection, EPA Region 4 staff used an infrared camera and a digital camera at the facility. Below is a list and description of the videos and photographs taken during the inspection.

Table 1: Videos and photographs taken during the January 24, 2023, inspection

File Number	Media Description
MOV_1161	Tank Farm 2
MOV_1162	Tank Farm 2
MOV_1163	Tank Farm 1
MOV_1164	Tank Farm 3
MOV_1165	Flare
IMG_1366	Flare
IMG_1377	Flare